

IN THE UNITED STATES DISTRICT COURT FOR THE

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

&

Willis Floyd Wiley &

Texas Department of &

Assistive and Rehabilitative &

Service (DARS) Consumer &

Plaintiff &

V &

Civil Action #

Texas Department of &

Assistive and Rehabilitation &

Service (DARS) Area Manager &

John Baker and(DARS) Unit &

Program Specialist Norman &

Attilee

Defendant

Title II of the American with Disabilities Act (ADA)

Violation Lawsuit

To the Honorable judge of said court

Comes now Willis Floyd Wiley the Plaintiff in the above civil Action

Number file this his title II of the American with Disabilities Act (ADA)

Violation Lawsuit against Texas Department of Assistive and Rehabilitative

Services (DARS) Area Manager John Baker and Unit Program Specialist

Norman Attilee for violating section II-3.2000 Denial of Participation.

II- 3.3000 Equality in Participation / benefit. II-3.4300 Right to Participate

In the regular program II -3.6200 Personal Services and devices II-3.11000

Retaliation and coercion of the American with Disabilities Act (ADA) and

Also for violating the Plaintiff fourteenth Amendment right to the United

States constitution and in support of said title II of the American with

Disabilities Act (ADA) violation Lawsuit the Plaintiff will show the

Honorable court the following

I

Jurisdiction

The Honorable court has Jurisdiction over this subject matter according
To title II of the American with disabilities Act (ADA) and the fourteenth
Amendment to the United States constitution

II

Allegation

Plaintiff Alleges that Texas Department of Assistive and Rehabilitative Service
(DARS) Area manager John Baker and (DARS) Unit program Specialist Norman
Attilee has violated and continue to violate title II of the American with Disabilities
Act (ADA) sec II- 3.2000 Denial of participation, sec II-3.3000 Equality in participation/
Benefit, sec II-3. 4300 Right to Participate in the Regular program, sec II-3.11000
Retaliation and Coercion. And for violating the fourteenth amendment of the United
States constitution by not proving the Plaintiff who is a Texas Department of
Rehabilitative service (DARS) Consumer Access to the program Benefits

III

Plaintiff of the Lawsuit

Plaintiff Willis Floyd Wiley is suing Texas Department of Assistive and Rehabilitative Service (DARS) Area Manager John Baker. And Texas Department of Rehabilitative Service (DARS) Unit Program Specialist Norman Attilee in there official capacity for Violating Title II of the American with Disabilities Act (ADA) sec II-3.2000 Denial Of Participation, sec II-3.3000 Equality in Participation/benefit, sec II-3.4300 Right To Participate in the regular Program, sec II-3.6200 Personal services and devices Sec II-3.11000 Retaliation and coercion. And for violating the Plaintiff right to the United States constitution the Plaintiff resides at 9222 Lockwood # 16 Houston Texas 77016

IV

Defendant to the Lawsuit

Defendant # 1 Texas Department of Assistive and Rehabilitative service (DARS) Area manager John Baker. Is being sued in his official capacity For violating Title II of the American with Disabilities Act (ADA) sec II- 3.2000 Denial of Participation, sec II- 3.3000 Equality in Participation/ Benefit, sec II- 3.4300 Right to Participate in the regular Program. Sec II- 3.6200 Personal services and devices II-3.11000 Retaliation and Coercion. And for violating the fourteenth Amendment of the United States Constitution the Defendant resides at 450 north Sam Houston Parkway, ste. 220 Houston, Texas 77060

Defendant # 2 Texas Department of Assistive and Rehabilitative service (DARS) unit Program Specialist Norman Attilee is being sued in his official Capacity for violating title II of the American with Disabilities Act (ADA) Sec –II 3.200 Denial of Participation, sec II- 3.3000 Equality in Participation /benefit, sec II-3.4300 Right to Participate in the regular program.

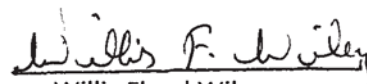
Sec II- 3.6200 Personal services and devices, sec II-3.11000 Retaliation and coercion.
And for violating the plaintiff right to the fourteenth Amendment of the United
States constitution the Defendant resides at 450 North Sam Houston Parkway, Ste.
220 Houston, Texas 77060

V

Lawsuit conclusion and Prayer Deman for a Jury trial and Damages

In conclusion of the lawsuit wherefore permission is consider the Plaintiff Pray that
The Honorable court grant the Plaintiff a jury trial on the facts in this lawsuit and at
Said jury trial the Plaintiff will Present evidence to show the Defendants did violate
Title II of the American with Disabilities act (ADA) sec II- 3.2000 Denial of Participation
Sec II- 3.3000 Equality in Participation /benefit, sec II-3. 4300 Right to Participate
In the Regular Program. Sec II-3. 6200 Personal services and devices, sec -3.11000
Retaliation and coercion. And the Defendant did violate the Plaintiff fourteenth
Amendment to the United States and in the event the Jury rules in the Plaintiff
Favor the Plaintiff ask to be awarded Damages for Emotional distress in the Amount
Of one hundred thousand dollars (\$ 100,000.00) compensatory Damages in
The Amount of One hundred thousand dollars (\$ 100,000.00) and Punitive
Damages in the Amount of one Hundred thousand dollars (\$ 100,000.00

Because of the Defendant violation of the Plaintiff fourteenth Amendment
Right to the United States Constitution.


Willis Floyd Wiley

9222 Lockwood # 16

Houston Tx 77016

832- 359 – 4346

VI

I Willis Floyd Wiley certify that a true and correct copy of said Lawsuit has
Been hand delivered to the United States District clerk office on this the 2 day
of July 2015


Willis Floyd Wiley